

Valerie McDonald
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VALERIE MCDONALD,

Plaintiff,

vs.

MRS BPO, LLC

Defendant

Case No.: 2:23-cv-01553-APG-VCP

DISCOVERY PLAN AND SCHEDULING
ORDER

SUBMITTED IN COMPLIANCE WITH LR-26-1

Pursuant to Local Rule 26-1, the parties submit their proposed discovery plan and scheduling order.

1. **Meeting:** Pursuant to FRCP 26(f) and LR-26-1(a), a meeting was held on November 20, 2023, and was attended by Plaintiff Valerie McDonald, pro per, and David Sexton, Esq., counsel for MRS BPO, LLC.

Pre-Discovery Disclosures: Pursuant to FRCP Rule 26(a)(1), the parties will make their pre-discovery disclosures, including but not limited to any computation(s) of damages required pursuant to FRCP 26(a)(i)(A)(iii), by December 4, 2023

Estimate Of Time Requested for Discovery /Discovery Cut Off Date

Discovery will take 180 days from the date of appearance of the first answering Defendant Pursuant to LR26-1(b)(1). Defendant appeared October 6, 2023. Accordingly, all discovery must be completed no later than April 3, 2024. The parties may conduct discovery within the scope of Fed. R. Civ. P. 26(b). Subject to the foregoing, discovery need not be limited or focused on particular issues or conducted in phases.

2. **Amending The Pleadings And Adding Parties**

Unless stated herein or ordered by the Court, the date for filing motions to amend the pleadings or to add parties shall not be later than 120 days prior to the discovery cut-off date and therefore no later than **February 2, 2024**.

3. **Fed R. Civ. P. 26(A)(2) Disclosures (Experts)**

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Disclosures identifying experts pursuant to Fed. R. Civ. P. 26(a)(2) shall be made 90 days prior to the discovery cut-off date, and therefore not later than **January 4, 2023**. Disclosures of rebuttal experts shall be made 45 days after the initial disclosure of experts and therefore no later than **February 19, 2023**.

4. Dispositive Motions

The parties shall file dispositive motions 30 days after the discovery cut off time and therefore no later than **May 3, 2024**

5. Pretrial Order

If no dispositive motions are filed, and unless otherwise ordered by this Court, the joint Pretrial Order shall be filed 30 days after the date set for filing dispositive motions, and therefore not later than **June 3, 2024**. In the event that dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until 30 days after the Court enters a ruling on the dispositive motions, or otherwise by further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the Joint Pretrial Order.

6. Alternative Dispute Resolution

Pursuant to LR 26-1(b)(7) the parties certify that they have not discussed the possibility of using alternative dispute-resolution processes including mediation or arbitration. The parties remain open to using them after further progress in discovery.

7. Alternative Forms Of Case Disposition

The parties certify that they considered consenting to trial by a magistrate judge and use of the Short Trial Program, but the parties have not agreed to these alternative forms of case disposition.

8. Electronic Evidence

The parties intend to meet and confer regarding electronic evidence should any disputes arise. Service Via Electronic Means the parties agree to accept service of all discovery requests, responses, and other notices via electronic mail. For service to be effective as to Plaintiff, Defendant must serve documents to the following email address: valeriecmcdonald@gmail.com. For service to be effective as to Defendant, Plaintiff must serve documents to the following email addresses: sextond@hallevans.com, bondsk@hallevans.com, and adidio@hallevans.com.

9. Extensions Or Modifications Of The Discovery Plan And Scheduling Order Pursuant To 26-3

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A motion or stipulation to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by a showing of good cause for the extension. A motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline. A request made within 21 days of the subject deadline must be supported by a showing of good cause. A request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect. A motion or stipulation to extend a discovery deadline or to reopen discovery must include:

- (a) A statement specifying the discovery completed
- (b) A specific description of the discovery that remains to be completed;
- (c) The reasons why the deadline was not satisfied, or the remaining discovery was not completed within the time limits set by the discovery plan; and
- (d) A proposed schedule for completing all remaining discovery

Dated this 20 day of November 2023

By: David Sexton

David Sexton, Esq.

Hall & Evans

sextond@hallevans.com

Counsel for Defendant

By: Valerie McDonald

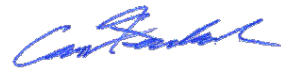
9004 In Vogue Ct

Las Vegas, NV 89149

valeriecmcdonald@gmail.com

Plaintiff, In Pro Per

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

November 27, 2023

DATED: _____

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